

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

BARINDA EDWARDS,)
)
 PLAINTIFF,) Case No.: 1:16-CV-3919-LMM-
 v.) WEJ
)
 EXPERIAN INFORMATION)
 SOLUTIONS, INC., AND)
 EQUIFAX INFORMATION)
 SERVICES, INC. AND TRANS)
 UNION LLC,)
)
 DEFENDANTS.)

**EXPERIAN INFORMATION SOLUTIONS, INC.’S
MOTION FOR LEAVE TO FILE ADDITIONAL FACTS
IN SUPPORT OF ITS MOTION FOR SUMMARY JUDGMENT**

Experian Information Solutions, Inc. (“Experian”), by and through its undersigned counsel, and pursuant to this Court’s Order (Dkt. 12), seeks leave of Court to file in excess of fifty (50) numbered facts in support of its Motion for Summary Judgment. As the basis for this request, Experian respectfully shows the Court as follows:

1. Pursuant to this Court’s Order (Dkt. 12), each party is limited to “no more than fifty (50) numbered facts...except by leave of Court.”
2. Experian intends to move for summary judgment on all of Plaintiff’s claims.

3. Plaintiff alleges Experian violated two separate provisions of the FCRA negligently, or in the alternative, willfully.

4. The events underlying Plaintiff's claims span five years.

5. Plaintiff's claim for actual damages relates to three purported mortgage applications, as well as emotional distress and/or humiliation.

6. Additional facts are needed to adequately address the breadth of Plaintiff's claims for alleged FCRA violations and actual damages.

7. Experian states that good cause exists to permit it to file up to one hundred (100) separately numbered facts in support of its forthcoming Motion for Summary Judgment.

8. Plaintiff does not oppose the requested relief.

For the reasons set forth above, Experian respectfully requests that it be permitted to file up to one hundred (100) separately numbered facts in support of its Motion for Summary Judgment.

Dated: August 28, 2017

Respectfully submitted,

/s/ Jessica C. Casey
Jessica C. Casey
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*Attorney for Defendant Experian
Information Solutions, Inc.*

CERTIFICATE OF COMPLIANCE

The undersigned hereby certifies that the foregoing document has been prepared in accordance with the font type and margin requirements of Local Rule 5.1 of the Northern District of Georgia, using a font type of Times New Roman and a point size of 14.

/s/ Jessica C. Casey
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CERTIFICATE OF SERVICE

I hereby certify that on August 28, 2017, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all attorneys of record via transmission of Notices of Electronic Filing generated by CM/ECF.

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